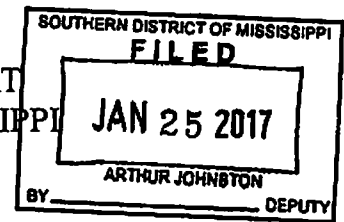


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

v.

CRIMINAL NO. *3:17cr9 HTW-FKB*

THOMAS WHEELER

21 U.S.C. § 846

The Grand Jury charges:

COUNT 1

Beginning at a date unknown but as early as July 1, 2015, and continuing through August 8, 2015, in Warren County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **THOMAS WHEELER**, knowingly and willfully did conspire with Elijah Moore and others known and unknown to the grand jury, to knowingly and intentionally possess with the intent to distribute 100 kilograms or more of marihuana, a Schedule I non-narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

COUNT 2

That on or about August 8, 2015 in Warren County, in the Northern Division of the Southern District of Mississippi, and elsewhere, the defendant, **THOMAS WHEELER**, knowingly and intentionally attempted to possess with the intent to distribute 100 kilograms or more of marihuana, a Schedule I non-narcotic drug controlled substance, in violation of Section 841(a)(1), Title 21, United States Code.

All in violation of Section 846, Title 21, United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense as alleged in this Indictment, the defendant shall forfeit to the United States all property involved in or traceable to property involved in the offense, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offense. Further, if any property described above, as a result of any act or omission of the defendant: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e) has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendant, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Section 853, Title 21, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL: _____
S/SIGNATURE REDACTED _____
Foreperson of the Grand Jury

This Indictment was returned in open court by the foreperson or deputy foreperson of the Grand Jury on this the 25th day of January, 2017.


UNITED STATES MAGISTRATE JUDGE